

Federal Defenders  
OF NEW YORK, INC.

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
Executive Director


Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

May 24, 2021

By ECF

The Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Application granted. **So ordered.**

  
NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE  
Dated: New York, New York  
May 25, 2021

**Re: United States v. Gregory Ferrer**  
**20 Cr 650 (NRB)**

Dear Judge Buchwald:

With the consent of the Government, I respectfully write to request a brief 5-day extension of the deadline for the defense's supplemental sentencing submission regarding the application of the Guidelines enhancements sought by Probation and the Government. The defense is waiting on the completion of a report by its retained chemist. This report is critical to preparation of the submission on Mr. Ferrer's behalf. This extension would still allow parties to finish fully briefing this issue 30 days prior to the scheduled sentencing hearing.

Defense Submission: June 1, 2021 (5 day extension)  
Government Reply: June 14, 2021 (5 day extension)  
Sentencing Hearing: July 14, 2021 (no change)

Thank you for your consideration of this matter.

Respectfully submitted,

/s/  
Zawadi Baharanyi  
Assistant Federal Defender  
(917) 612-2753

cc: Mitzi Steiner  
Assistant United States Attorney